March 9, 2022

# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT

Deputy

UNITED STATES OF AMERICA,

Plaintiff,

S

INDICTMENT

V.

CT 1: 8:1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B) (i) - Conspiracy to Transport Aliens;

Defendant.

CT 2: 8:1324(a)(1)(A)(ii)& (a)(1)(B)(ii) - Transporting Aliens.

THE GRAND JURY CHARGES:

### **COUNT ONE**

 $(8 \text{ U.S.C. } \S 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) \text{ and } (a)(1)(B)(i))$ 

On or about February 8, 2022, in the Western District of Texas, Defendant,

## AHMAD NABIH MUSTAFA,

knowingly, intentionally, and unlawfully conspired, combined, and confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, namely: to transport and move and attempt to transport and move aliens within the United States knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

### COUNT TWO

 $(8 \text{ U.S.C. } \S 1324(a)(1)(A)(ii) \& (a)(1)(B)(ii))$ 

On or about February 8, 2022, in the Western District of Texas, Defendant,

### AHMAD NABIH MUSTAFA,

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move such aliens within the United States, in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(ii).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF

UNITED STATES, ATTORNEY

BY:

Assistant U.S. Attorney